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December 6, 2023

Via ecf filing

The Honorable Leda Dunn Wettre United States Magistrate Judge United States District Court for the District of New Jersey 50 Walnut Street Newark, NJ 07102

> Re: Sefelino v. County College of Morris No. 2:23-cv-01595-MEF-LDW

Dear Magistrate Judge Wettre:

I represent the plaintiff in this case. Pursuant to the Court's amended scheduling order of October 17, 2023 (ECF No. 39), I write to provide the Court with a status of the matter in advance of the status conference scheduled for December 13, 2023.

The parties have recently completed written discovery and are in the process of trying to schedule depositions of the defendants and other representatives of the County College of Morris. Despite the parties' good-faith efforts, the parties have not settled on mutually agreeable dates. The impending holidays make scheduling those depositions before the January 5, 2024, discovery deadline difficult. The parties therefore respectfully request additional time to complete depositions. Moreover, although in the nascent stage, the parties have started to discuss a potential settlement. Accordingly, the parties request that the Court extend the deadline to complete depositions of fact witnesses until March 5, 2024. This additional time will allow the parties to complete the depositions and to focus efforts on a potential resolution that would alleviate the need for depositions.

We stand ready to answer any questions the Court might have about this case.



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Respectfully,

Wally Zimolong, Esquire

cc: R. Scott Farhney, Esq.
Jonathan F. Mitchell, Esq.